

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

IN RE: T-MOBILE CUSTOMER DATA ) MDL No. 3019  
SECURITY BREACH LITIGATION )  
 ) Master Case No. 4:21-md-03019-BCW  
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**DECLARATION OF ROBERT CLORE IN SUPPORT OF OBJECTOR CASSIE  
HAMPE'S MOTION FOR ATTORNEYS' FEES AND INCENTIVE AWARD**

Comes now Robert Clore and states the following under oath and under penalty of perjury:

1. My name is Robert Clore. I am over the age of eighteen (18) years. I am qualified and competent to make this affidavit. The facts stated herein are within my personal knowledge.
2. I am an attorney at the Bandas Law Firm, P.C. Along with Tony LaCroix, Mikell West, and Christopher Bandas, I represent the objecting class member Cassie Hampe.
3. I am an AV Preeminent rated attorney with Martindale-Hubbell and am a member in good standing with the State Bar of Texas and the State of New Jersey. I am also admitted and in good standing in the Southern District of Texas, Northern District of Illinois (General Bar), the District of New Jersey, the United States Court of Appeals for the Second, Third, Fourth, Fifth, Sixth, Seventh, Eighth, Ninth, Tenth, and Eleventh Circuits, and the United States Supreme Court.
4. I submit this declaration in support of Objector Cassie Hampe's motion for attorneys' fees and incentive award based on the benefit of at least \$32,978,209 she and her counsel bestowed on the class (assuming the Court's acceptance of class counsel's renewed fee proposal). In light of this significant result, Ms. Hampe respectfully requests 8% of the benefit in attorneys' fees under the percentage method. She also requests an incentive award of \$2,500, in line with the awards to the class representatives.

5. On remand, class counsel have petitioned this Court for \$45,771,790.40 in attorneys' fees based on a 5.6 lodestar multiplier. (Doc. 253). If the district court grants the request, Hampe and her counsel will have benefitted the class by \$32,978,209.<sup>1</sup> That is a staggering sum which Hampe and her counsel alone are responsible for securing.

6. After several years of high-risk litigation and successful appellate work that resulted in at least \$32.9 million for the class, Hampe's motion for attorneys' fees respectfully requests 8% of that class benefit, which amounts to \$2,647,859 in reasonable attorneys' fees. As some courts have noted, the percentage of the benefit method appropriately "ties Objector's fees award to the benefit he obtained for the class and aligns their interests." *In re Easysaver Rewards Litig.*, No. 09-cv-02094, 2021 WL 230013, at \*3 (S.D. Cal. Jan. 22, 2021). The proposed 8% fee is well within the range of reasonable attorneys' fees for objectors. Hampe's counsel recently received a comparable percentage (7%) from an approximate \$21 million benefit provided to a settlement class, with the judge characterizing the fee request as "relatively modest." *In re Optical Disk Drive Prods. Antitrust Litig.*, No. 10-md-02143, Dkt. 3062, 2021 U.S. Dist. LEXIS 171405, at \*24 (N. D. Cal. Sept. 9, 2021) (awarding \$1.5 million in fees as 7% of approximate \$21 million increase to the common fund). Even more recently, a court approved a 14% fee for Hampe's same counsel based on a \$4.38 million increase to a common fund, with the court characterizing the fee award as "modest and well within typical percentages awarded to objectors." *In re Optical Disk Drive Prods. Antitrust Litig.*, 2022 U.S. Dist. LEXIS 151727, \*20 (N.D. Cal. Aug. 22, 2022); see also *Easysaver*, 2021 WL 230013, at \*3 (awarding objector \$805,000 in fees as 25% of benefit); *Eubank v. Pella Corp.*, No. 06-CV 4481, 2019 WL 1227832, at \*8 (N.D. Ill. Mar. 15, 2019) ("It is well recognized that objectors who add value to litigation ... are entitled to recover a substantial share of overall attorney's fees. Seventh Circuit caselaw has previously placed such recoveries around

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<sup>1</sup> \$78.75 million - \$45,771,790.40 = \$32,978,209.

20% of the total attorney's fees."); *Kaufman v. American Express Travel Related Servs., Co.*, 2016 WL 806546, at \*13-\*14 (N.D. Ill. Mar. 2, 2016) (awarding objector fees of 34% of the benefit); *Dewey v. Volkswagen of Am.*, 909 F. Supp. 2d 373, 396 (D.N.J. 2012) ("10% of the benefit conferred [is] well within the range of acceptable . . . recovery"); *Lan v. Ludrof*, No. 1:06-cv-114, 2008 WL 763763, at \*28 (W.D. Pa. Mar. 21, 2008) (awarding objector fee of 25% of the benefit).

7. Moreover, as described herein, this percentage-based request results in a lodestar multiplier of approximately 5.6, equivalent to the multiplier proposed by counsel for their results, and within the range of reasonable multipliers in the Eighth Circuit, albeit on the upper side. *See Caligiuri v. Symantec Corp.*, 855 F.3d 860, 866 (8th Cir. 2017) (noting the Eighth Circuit allows "multipliers of up to 5.6"); *Huyer v. Buckley*, 849 F.3d 395, 399–400 (8th Cir. 2017) (describing the range as going "up to 5.6"). It is also in line with multipliers awarded to objectors elsewhere. *See Pella*, 2019 WL 1227832, at \*9 (awarding objectors' counsel "a multiplier of six"); *Optical Disk*, No. 10-md-02143, Dkt. 3062, 2021 U.S. Dist. LEXIS 171405, at \*24 (2.99 multiplier for objector); *Optical Disk*, 2022 U.S. Dist. LEXIS 151727, \*20 (2.8 multiplier for objector).

8. This is appropriate given the sizeable, and what appears to be a nearly unprecedented increase in class benefits secured by an objector and considering the tremendous risk Hampe and her attorneys took in objecting here. Out of 76 million class members, only 13 objected. (Doc. 235 at 5). Hampe's objection was the only one that provided a meaningful challenge to the \$78 million fee. Indeed, her objection and appeal alone secured the \$32.9 million benefit for the class. (Doc. 216 at 2, Doc. 216-3 at 1-2).

9. Hampe achieved this victory in a circuit court of appeals that on average reverses fewer than 5% of the appeals before it,<sup>2</sup> and that has seldom reversed attorneys' fees as excessive from a class

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<sup>2</sup>See [https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.uscourts.gov%2Fsites%2Fdefault%2Ffiles%2Fdata\\_tables%2Fstfj\\_b5\\_630.2024.xlsx&wdOrigin=BROWSELINK](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.uscourts.gov%2Fsites%2Fdefault%2Ffiles%2Fdata_tables%2Fstfj_b5_630.2024.xlsx&wdOrigin=BROWSELINK) (3.2% reversal rate in 2024 based on 90 reversals out of 2,747 appeals); [https://www.uscourts.gov/sites/default/files/data\\_tables/jb\\_b5\\_0930.2022.pdf](https://www.uscourts.gov/sites/default/files/data_tables/jb_b5_0930.2022.pdf) (3.5%

action settlement. I conducted a Lexis search among opinions from the U.S. Court of Appeals, Eighth Circuit using the following inquiry: revers! or vacat! /p fees /p excessive or high & “class action” & settlement. I found only two opinions that appear to have reversed an award of attorneys’ fees in a class action settlement based on a finding that they were excessive. *See Jorstad v. IDS Realty Trust*, 643 F.2d 1305, 1312 (8th Cir. 1981) (“review of the arguments, the briefs and the record in this appeal has convinced us that Judge Lord’s award of fees was excessive and must be reduced”); *Grunin v. International House of Pancakes*, 513 F.2d 114, 128-29 (8th Cir. 1975) (affirming in all respects except for remanding on fees for one attorney who did not submit hourly rates or time spent in the case). Although I cannot say with absolute certainty that there are no other opinions from the Eighth Circuit reversing fees as excessive from a class action settlement, these are the only two opinions I was able to find. Regardless, the objection and appeal were brought with considerable risk and anticipating that we would be met with vigorous opposition from highly skilled and experienced counsel, which proved correct.

10. Hampe’s counsel and paralegal dedicated at least 668.2 hours securing the \$32.9 million (or greater) benefit for the class. The result is a lodestar of \$472,832.50. Hampe’s counsels’ lodestar was accumulated as follows: Robert Clore, 430.6 hours x \$800 = \$344,480; Mikell West, 120.8 hours x \$700 = \$84,560; Tony La Croix, 66.7 hours x \$450 = \$30,015; and Norman Taylor, 50.1 hours x \$275 = \$13,777.50. That lodestar was accumulated between December 2022 and August 2024 and covers Ms. Hampe’s objection to class counsels’ requested \$78.75 million fee and her successful appeal of the award in that amount. It excludes any time spent on this fee motion. I view Hampe’s counsels’ total lodestar as a reasonable expenditure of time, particularly considering the 668.2 hours accumulated

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reversal rate in 2022 based on 91 reversals out of 2,572 appeals); *see also* Colter Paulson, Reversal Rates in the Sixth Circuit and Elsewhere (May 31, 2023), <https://www.sixthcircuitappellateblog.com/news-and-analysis/reversal-rates-in-the-sixth-circuit-and-elsewhere/#:~:text=The%20Eighth%20Circuit's%20overall%20reversal,less%20than%20any%20other%20circuit>.

for all litigation is less than the 1,000 hours class counsel billed for the appeal alone. Since only three attorneys and one paralegal conducted this work, we were able to avoid duplicative efforts, and the relatively small number of hours reflect this efficiency.

11. Attached to this declaration as Exhibit 1-A is the breakdown of lodestar by professional as well as a true and correct copy of the billing records of each. These hourly rates are in line with hourly rates previously approved by courts for the same counsel. *See e.g., In re Optical Disk Drive Prods. Antitrust Litig.*, No. 10-md-02143-RS, 2021 U.S. Dist. LEXIS 171405, at \*25-26 (N.D. Cal. 2021) (finding fee reasonable on lodestar cross-check where Mr. Clore billed at an hourly rate of \$750; noting that this rate “falls on the lower end of the range that has been found reasonable in similar circumstances”); *In re Optical Disk Drive Prods. Antitrust Litig.*, 2022 U.S. Dist. LEXIS 151727, \*20 (N.D. Cal. Aug. 22, 2022) (awarding requested fee); *id.* Doc. 3101-2 at 5 (requesting \$750/hourly rate for Mr. Clore); *In re Syngenta*, 2:14-md-02591, Doc. 4308 at 2 (D. Kan. Jan. 6, 2020) (approving as reasonable hourly rate of \$500 for Anthony LaCroix and \$600 for Mr. Clore before becoming partner, as requested in Doc. 4278-3 ¶¶ 5-6, 13-14). They are also well below the rates of the Adjusted Laffey Matrix for attorneys and paralegals. *See* <http://www.laffeymatrix.com/see.html> (\$1057/hour for attorneys out of law school for more than twenty years, \$878 for attorneys out of law school for 11-19 years, and \$538 for a paralegal with 4-7 years’ experience). And they are far below class counsels’ hourly rates in this case. *See* Doc. 179-1 Ex. B (nine partners billing above \$1,000/hour; 13 year attorney, Gary Smith of Hausfield LLP billing at \$960/hour).

12. Hampe’s counsels’ work included legal research ahead of the objection, analysis of class counsels’ motion for attorneys’ fees and supporting paperwork, drafting Hampe’s 19-page objection, legal research and additional drafting of replies and other papers supporting Hampe’s objection in the district court, traveling to and from Tyler, Texas for Hampe’s deposition, travelling to and from Kansas City for the fairness hearing, legal research and analysis in connection with the decision to

pursue an appeal, preparing the appellate record and administrative filings, drafting a 51-page opening brief, reviewing class counsels' 74-page answering brief, drafting a 31-page reply brief, reviewing additional authority and filing supplemental authority, preparing for oral argument, including several moot courts, traveling to and from St. Louis for argument in the Eighth Circuit, participating in argument, preparing and filing a post-argument brief, and generally monitoring the district court and appellate docket over the course of nearly two years. Significantly, Hampe's aggregate 668.2 hours for *all* litigation (including the successful appeal) are far below what class counsel billed (1,000 hours) for their appellate work. (Doc. 179 at 16) ("Class counsel reasonably expect they will spend 1,000 hours litigating any appeals"). I believe these hours and the \$472,832.50 lodestar to have been reasonable and necessary in Hampe's securing of the approximate \$32.9 million benefit to the class.

<b>Attorney</b>	<b>Years Exp.</b>	<b>Hourly Rate</b>	<b>Hours</b>	<b>Total</b>
Robert W. Clore, Non-equity Partner, Bandas Law Firm, PC	25	\$800	430.6	\$344,480
Mikell West, Managing Attorney Bandas Law Firm, PC	14	\$700	120.8	\$84,560
Norman Taylor, Paralegal, Bandas Law Firm, PC	7	\$275	50.1	\$13,777.50
Anthony LaCroix, Owner LaCroix Law Firm, LLC	16	\$450	66.7	\$30,015
<b>TOTAL</b>			668.2	<b>\$472,832.50</b>

13. For purposes of professional background, I am rated AV Preeminent by Martindale-Hubbell and have been described as "a seasoned plaintiffs attorney who has successfully represented clients objecting to a number of big-ticket MDL settlements before trial courts and on appeal." Dorothy Atkins, Settling On Zoom: The Rise of Pro Se MDL Objectors, Law360 (Dec. 22, 2020),

<https://www.law360.com/articles/1337218>. Indeed, in the last three years alone, my representation of class members has resulted in tens of millions in benefits conveyed to class members Nationwide. See e.g., *In re Optical Disk Drive Prods. Antitrust Litig.*, No. 21-16291, 2022 U.S. App. LEXIS 15571, at \*7 (9th Cir. 2022) (securing vacatur of fee award that resulted in \$4.38 million class benefit); *In re Optical Disk Drive Prod. Antitrust Litig.*, 959 F.3d 922 (9th Cir. 2020) and *In re Optical Disk Drive Prod. Antitrust Litig.*, 804 Fed.Appx. 443 (9th Cir. 2020) (prevailing in appeal with vacatur of \$52.8 million fee award that resulted in \$21.8 million class benefit). I recently secured a victory in the Eleventh Circuit in connection with an objection that Justice Gerald Tjoflat characterized as “rock solid[.]” *Drazen v. Pinto*, 101 F.4th 1224, 1277 (11th Cir. May 13, 2024). I have also fought successfully in cases that did not necessarily achieve financial gains but nevertheless resulted in beneficial precedent for absent class members. See e.g., *In re Lumber Liquidators Chinese-Manufactured Flooring Prod. Mktg., Sales Practices & Prod. Liab. Litig.*, 952 F.3d 471, 489 (4th Cir. 2020) (determining vouchers were coupons under 28 U.S.C. § 1712, the Class Action Fairness Act (“CAFA”), and vacating attorneys’ fee award); *Chambers v. Whirlpool Corp.*, 980 F.3d 645 (9th Cir. 2020) (rejecting district court’s failure to apply CAFA’s coupon provision and vacating improper attorneys’ fee award).

14. Mr. West is a fourteen-year attorney with experience in complex and multi-district litigation. He is a member in good standing of the Texas and Arizona bars and is admitted to practice before the United States Supreme Court, the U.S. Circuit Courts of Appeals, Fifth and Ninth Circuits, and the United States District Courts for the Southern, Eastern, and Western Districts of Texas. Mr. West was rated as a 2023 and 2024 Rising Star by Super Lawyers and is also a member of the Texas Bar College. In addition to an active trial docket in both federal and state courts, Mr. West assists with appellate practice and class action litigation.

15. Mr. LaCroix is a sixteen-year attorney with years of experience in complex and class action litigation representing individuals and companies in high stakes disputes. He is a member in good

standing of the Missouri, Kansas, and Arkansas bars and is admitted to practice before the United States Supreme Court and the 8th and 10th U.S. Circuit Courts of Appeals. Mr. LaCroix is experienced in class action litigation, having been certified as class counsel in the matters of *Barry Road Associates, Inc. v. Southwestern Bell Telephone Co.*, No. 1016-cv-02438 (Circuit Court of Jackson County, Missouri, July 31, 2013) (resulting in the return of \$21.7 million to Missouri AT&T customers) and *Walters v. Family Dollar Stores of Missouri, Inc.*, No. 1016-cv11842 (Circuit Court of Jackson County, Missouri, May 10, 2011), and further served as co-counsel in *Prater v. Medicredit, Inc.*, No. 4:14-cv-00159 (E.D. Mo. Dec. 7, 2015) and *Rhodenbaugh v. CVS Pharmacy, Inc.*, No. 0916-cv09631 (Circuit Court of Jackson County, Missouri, Sept. 1, 2011), each of which was resolved in favor of the certified class.

16. Mr. Taylor is a paralegal with seven years of experience assisting and participating in complex and high-value litigation both in Texas and across the country. Mr. Taylor is certified as a paralegal by the American Bar Association.

17. The fact that the Eighth Circuit did not embrace Hampe's subset argument (i.e., the megafund argument) should not reduce Hampe's attorney fees. This segment of Hampe's attorneys' fees challenge was not "distinct in all respects from the prevailing claims." *Gruttemeyer*, 31 F.4th at 649-50. To the contrary, Hampe's discussion of the excessive lodestar multiplier was a significant part of both the megafund argument and the argument that fees were excessive under Eighth Circuit precedent. (Doc. 189 at 1-3, 12-16; Opening Brief of Cassie Hampe, Appeal No. 23-2744 at 1, 7, 12, 14-15, 21, 23-27, 29, 32-34; Reply Brief at 1, 4-13, 17-19); *see Tabech v. Gunter*, 869 F. Supp. 1446, 1465 (D. Neb. Dec. 1, 1994) ("where the claims are interrelated, 'in the majority of cases, courts have rejected the contention that the lodestar should be adjusted downward for unsuccessful claims, usually finding that the successful and unsuccessful claims were legally or factually intertwined or that counsel devoted most of its time to the litigation as a whole'"); *see also Optical Disk*, 2022 U.S. Dist. LEXIS 151727, \*20 ("[a] lodestar 'cross-check' shows the award does not result in an unreasonable windfall, despite the

likelihood that a relatively small part of hours incurred in the appeal were expended on the issue as to which Erwin prevailed”); *Eaysaver*, 2021 U.S. Dist. LEXIS 13119, at \*8 (refusing to reduce fee request notwithstanding multiple unsuccessful arguments; “[a]lthough Objector did not prevail on many of his challenges to the settlement, he did succeed in convincing the Court to significantly reduce class counsel's fee award.”). Further, since Hampe seeks fees as a percentage of a “readily quantifiable benefit” to the class and not under the lodestar method, her request is justified even if some amount of her lodestar could be assigned to unsuccessful argument. *See Optical Disk*, 2021 U.S. Dist. LEXIS 171405, \*24 (although inadequate documentation of lodestar might be problematic for fees sought under the lodestar method, it was not where objector requested “a percentage-based fee award” based on a “readily quantifiable benefit to the class”)

18. Additionally, the *Johnson* factors weigh in favor of Hampe’s requested 8% fee. *See Johnson v. Ga. Highway Express, Inc.*, 488 F.2d 714, 719–20 (5th Cir. 1974); *see also In re Target Corp. Customer Data Security Breach Litig.*, 892 F.3d 968, 977 (8th Cir. 2018). To be sure, “[m]any of the *Johnson* factors are related to one another and lend themselves to being analyzed in tandem.” *Swinton v. SquareTrade, Inc.*, 454 F. Supp. 3d 848, 886 (S.D. Iowa 2020). Therefore, courts in the Eighth Circuit often focus on the most relevant *Johnson* factors in evaluating fee requests. *See In re Xcel Energy, Inc., Securities, Derivative & “ERISA” Litig.*, 364 F. Supp. 2d 980, 993 (D. Minn. 2005); *Tussey*, 2019 WL 3859763, at \*2; *Yarrington v. Solvay Pharms., Inc.*, 697 F. Supp. 2d 1057, 1062 (D. Minn. 2010); *see also Hardman v. Bd. of Educ. of Dollarway, Arkansas Sch. Dist.*, 714 F.2d 823, 825 (8th Cir. 1983).

19. First, the benefits conferred by Hampe and her counsel on the settlement class are extraordinary. “In considering a fee award, the ‘most critical factor’ is ‘the degree of success obtained.’” *In re UnitedHealth Group Inc. PSLRA Litig.*, 643 F. Supp. 2d 1094, 1104 (D. Minn. 2009) (quoting *Hensley v. Eckerhart*, 461 U.S. 424, 436 (1983)). The \$32.9 million (or greater) benefit bestowed by Hampe represents a significant recovery for the class. In fact, it appears to be one of the largest benefits ever

bestowed by an objecting class member under Rule 23. *Compare with Optical Disk*, 2021 U.S. Dist. LEXIS 171405, \*23 (for an objection that resulted in \$21.8 million class benefit, “[t]here is no dispute that Erwin is entitled to recover fees under the circumstances”); *Rougvie v. Ascena Retail Grp., Inc.*, 2019 U.S. Dist. LEXIS 28229, \*50-51 (E.D. Pa. Feb. 21, 2019) (awarding 25% in fees to objector whose objection “resulted in a \$5.1 million benefit to the Class”).

20. Second, Hampe and her counsel faced numerous and substantial risks. Making the degree of success even more remarkable, Hampe and her counsel obtained an outstanding \$32.9 million (or greater) class benefit in the face of these substantial risks. From the outset, we knew that we would face class action attorneys who have successfully achieved large data breach settlements across the nation, and that opposing their fee would require advocacy against some of the most skilled attorneys in the field. Further, considering so few class members objected to the fee, it can be inferred that opposing this fee and pursuing an appeal was highly undesirable. And considering statistics from the Eighth Circuit, where on average fewer than 5% of cases result in reversal,<sup>3</sup> once this Court awarded fees, there was a strong probability of affirmance and relatively remote possibility that Hampe would return fees to the class.

21. “Courts have recognized that the risk of receiving little or no recovery is a major factor in awarding attorney fees.” *Yarrington v. Solvay Pharms., Inc.*, 697 F. Supp. 2d 1057, 1062 (D. Minn. 2010) (quoting *Xcel Energy*, 364 F. Supp. 2d at 994). “Unless that risk is compensated with a commensurate award, no firm, no matter how large or well-financed, will have the incentive to consider pursuing a case such as this.” *Tussey*, 2019 WL 3859763, at \*3. Despite these risks and despite the undesirability

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<sup>3</sup>See [https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.uscourts.gov%2Fsites%2Fdefault%2Ffiles%2Fdata\\_tables%2Fstfj\\_b5\\_630.2024.xlsx&wdOrigin=BROWSELINK](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.uscourts.gov%2Fsites%2Fdefault%2Ffiles%2Fdata_tables%2Fstfj_b5_630.2024.xlsx&wdOrigin=BROWSELINK) (3.2% reversal rate in 2024 based on 90 reversals out of 2,747 appeals); [https://www.uscourts.gov/sites/default/files/data\\_tables/jb\\_b5\\_0930.2022.pdf](https://www.uscourts.gov/sites/default/files/data_tables/jb_b5_0930.2022.pdf) (3.5% reversal rate in 2022 based on 91 reversals out of 2,572 appeals); see also Colter Paulson, Reversal Rates in the Sixth Circuit and Elsewhere (May 31, 2023), <https://www.sixthcircuitappellateblog.com/news-and-analysis/reversal-rates-in-the-sixth-circuit-and-elsewhere/#:~:text=The%20Eighth%20Circuit's%20overall%20reversal,less%20than%20any%20other%20circuit>.

of pursuing the objection, Hampe secured at least a \$32.9 million benefit for the class. These factors weigh in favor of the requested 8% fee.

22. Third, Hampe and her counsel expended significant time and labor in achieving this substantial result for the class. Again, Hampe's counsel and paralegal dedicated at least 668.2 hours in securing the \$32.9 million (or greater) benefit. Hampe's counsel worked efficiently considering her aggregate hours for both the objection before this Court and the appeal are below the 1,000 hours class counsel billed for handling appeals. (Doc. 179 at 16). As noted, Hampe's counsels' considerable work included legal research ahead of the objection, analysis of class counsels' motion for attorneys' fees and supporting paperwork, drafting Hampe's 19-page objection, legal research and additional drafting of replies and other papers supporting Hampe's objection in the district court, traveling to and from Tyler, Texas for Hampe's deposition, travelling to and from Kansas City for the fairness hearing, legal research and analysis in connection with the decision to pursue an appeal, preparing the appellate record and administrative filings, drafting a 51-page opening brief, reviewing class counsels' 74-page answering brief, drafting a 31-page reply brief, reviewing additional authority and filing supplemental authority, preparing for oral argument, including several moot courts, traveling to and from St. Louis for argument in the Eighth Circuit, participating in argument, preparing and filing a post-argument brief, and generally monitoring the district court and appellate docket over the course of nearly two years.

23. Fourth, objector's counsel are highly skilled. Including this case, they have successfully benefitted settlement classes around the nation by more than \$60 million in the last four years. (Doc. 189 at 4-5). We are among a very small number of attorneys nationwide who have had comparable successes on behalf of class members. And objector's counsel had to square off against exceptionally skilled counsel representing the class. As the Court is of course aware, the class is represented by

Norman Siegel of Stueve Siegel Hanson LLP, James Pizzirusso of Hausfeld LLP, and Cari Laufenberg of Keller Rohrback L.L.P.

24. Fifth, the requested fee is less than or comparable to other awards. Indeed, the requested fee is in line with—if not substantially lower than—awards in which objectors bestowed benefits to settlement classes. *Optical Disk*, 2022 U.S. Dist. LEXIS 151727, \*20 (14% fee for objector “modest and well within typical percentages awarded to objectors”); *Eaysaver*, 2021 WL 230013, at \*3 (awarding 25% of benefit to objector); *Eubank*, 2019 WL 1227832, at \*8 (noting that objector’s counsel typically received fee awards of 20%); *Kaufman*, 2016 WL 806546, at \*13-\*14 (awarding objector fees of 34% of the benefit); *Dewey*, 909 F. Supp. 2d 373 at 396 (“10% of the benefit conferred [is] well within the range of acceptable . . . recovery”); *Ludrof*, 2008 WL 763763, at \*28 (awarding objector fee of 25% of the benefit). Further, in the Eighth Circuit, courts have “frequently awarded attorneys’ fees ranging up to 36% in class actions.” *Huyer v. Buckley*, 849 F.3d 395, 399 (8th Cir. 2017). Hampe’s request for fees is thus reasonable relative to other similar cases. Hampe therefore respectfully requests that the Court award her 8% of the benefit bestowed as attorneys’ fees, which is supported by the *Johnson* factors.

25. By her motion, Hampe has also requested an incentive award in the amount of \$2,500 for the risk she assumed and the efforts required in stepping forward as an objector. Incentive awards in class action cases “are intended to compensate class representatives for work done on behalf of the class, to make up for financial or reputational risk undertaken in bringing the action, and, sometimes, to recognize their willingness to act as a private attorney general.” *Rodriguez I*, 563 F.3d at 958-59; *In re Regulus Therapeutics Inc. Sec. Litig.*, No. 3:17-CV-182-BTM-RBB, 2020 U.S. Dist. LEXIS 202787, 2020 WL 6381898, at \*8 (S.D. Cal. Oct. 30, 2020) (“Incentive awards typically range from \$2,000 to \$10,000”) (quotation omitted). Courts regularly award incentive awards to objectors for their work in

bestowing material benefits to the class. *See e.g.*, *Optical Disk*, 2022 U.S. Dist. LEXIS 151727, at \*22; *Optical Disk*, 2021 U.S. Dist. LEXIS 171405, at \*28; *Easysaver*, 2021 WL 230013, at \*3-4.

26. Mr. Hampe's requested \$2,500 is the same amount awarded to the class representatives. In opposing class counsels' fee, Hampe assumed considerable risk in facing highly skilled counsel and unlike the class representatives, gave a deposition. Further, \$2,500 is within the ordinary range of reasonable incentive awards for objectors and class members alike. *See e.g.*, *Hawkins v. Kroger Co.*, No. 15cv2320 JM (AHG), 2022 U.S. Dist. LEXIS 20956, at \*31 (S.D. Cal. 2022) (awarding plaintiff \$7,000 incentive award); *Optical Disk*, 2022 U.S. Dist. LEXIS 151727, at \*22 (awarding \$5,500 incentive award to objector); *Optical Disk*, 2021 U.S. Dist. LEXIS 171405, at \*28. (awarding \$1,500 incentive award to objector); *Easysaver*, 2021 WL 230013, at \*3-4 (awarding \$2,500 for objector's participation in the case); *In re Apple Inc. Sec. Litig.*, No. 5:06-CV-05208-JF HRL, 2011 WL 1877988, at \*5 (N.D. Cal. May 17, 2011) (awarding \$1,000 incentive award to objector).

Dated this the 23rd day of September 2024.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ Robert Clore  
Robert Clore

EX. 1-A

**Total Aggregate Lodestar of Counsel for Cassie Hampe**

*In re: T-Mobile Customer Data Security Breach Litigation*, Case No. 421-md-03019 (W.D. Mo.) and Appeal No. 23-2744 (8th Cir.)

<b>Attorney</b>	<b>Years Exp.</b>	<b>Hourly Rate</b>	<b>Hours</b>	<b>Total</b>
Robert W. Clore, Non-equity Partner, Bandas Law Firm, PC	25	\$800	430.6	\$344,480
Mikell West, Managing Attorney Bandas Law Firm, PC	14	\$700	120.8	\$84,560
Norman Taylor, Paralegal, Bandas Law Firm, PC	7	\$275	50.1	\$13,777.50
Anthony LaCroix, Owner LaCroix Law Firm, LLC	16	\$450	66.7	\$30,015
<b>TOTAL</b>			668.2	<b>\$472,832.50</b>

## **Hourly Billing of Robert Clore, Attorney, Bandas Law Firm**

*In re: T-Mobile Customer Data Security Breach Litigation, Case No. 421-md-03019 (W.D. Mo.) and Appeal No. 23-2744 (8th Cir.)*

Date	Hours	Description
12/2/2022	0.3	Email with Tony LaCroix re representation.
	0.2	Email with client re representation.
12/4/2022	0.2	Email with client re representation.
	4.8	Reviewed and analyzed T Mobile settlement, class counsels' fee motion, and supporting exhibits.
	4.6	Outlined and started drafting objection to attorneys' fees.
12/5/2022	0.4	Email exchange with local counsel re representation and objection.
	7.8	Continued drafting objection to attorneys' fees
12/6/2022	.6	Email exchange with local counsel re Hampe declaration and pro hac application
	0.4	Email exchange with Mikell West.
	0.6	Prep of declaration for Cassie Hampe's review.
	0.4	Email exchange with Cassie Hampe re declaration.
	0.7	Prepared attachment for pro hac application.
	7.5	Continued drafting objection to fees.
12/7/2022	0.9	Email exchange with local counsel re Hampe dec and pro hac applications and attachments.
	0.6	Email exchange with Mikell West re pro hac applications and attachments.
	8.6	Drafted objection to fees.
12/8/2022	8.7	Continued drafting, editing, and finalized objection to fees.
	0.8	Email exchanges with local counsel re filing objection.
	0.3	Emailed client concerning objection.
12/9/2022	0.3	Email exchange with local counsel re objection.
12/19/2022	0.9	Email exchange with Norm Siegel and chambers re subpoena for Hampe depo.
	0.6	Reviewed and analyzed subpoena for testimony and to produce documents for Hampe.
12/20/2022	0.4	Email exchange with chambers re conference call on subpoena.
	0.4	Email exchange with lc re conference call.
12/21/2022	0.3	Email exchange with lc and Chambers re position paper on subpoena.

	0.4	Email exchange with Mikell West re position paper on subpoena.
	0.5	Email exchange with lc re position paper on subpoena.
	5.6	Drafted and edited position paper on subpoena.
12/22/2022	0.3	Reviewed order on discovery of Hampe.
	0.4	Email exchange with Norm Siegel re dates for depo and production of documents.
	0.5	Texted and called client re deposition.
12/29/2022	0.4	Reviewed email from Norm Siegel re new location for depo and reviewed amended subpoena.
	0.7	Gathered documents responsive to subpoena duces tecum.
	1.2	Prepared privilege log.
	0.6	Texted and called client re deposition.
	0.3	Text exchange with Mikell West re privilege log.
12/30/2022	0.8	Edited privilege log and objection to subpoena duces tecum.
	0.8	Email exchanges with lc and Mikell West re discovery responses.
	0.2	Emailed class counsel written discovery responses.
	0.4	Texted client re meeting ahead of deposition.
	0.2	Text exchange with Mikell West re discovery.
1/1/2023	0.4	Texted Mikell West re client deposition.
1/2/2023	4.5	Travel to Tyler, Texas for depo of client.
	1.6	Drafted potential questions anticipated for client deposition.
	0.5	Email exchanges with Mikell West re client deposition.
	0.3	Text exchanges with Mikell West re client deposition.
	0.2	Emailed client re deposition.
	0.5	Texted client re deposition.
	1.4	Traveled to client's home, met with client in person with Mikell West and lc on Zoom in preparation for depo.
1/3/2023	2.5	Travel to and from hotel to depo; depo of client.
	6.4	Travel back to Corpus Christi from Tyler, Texas.

1/10/2023	1.3	Reviewed depo transcript of client.
	0.6	Email exchange with lc re depo transcript and anticipated reply to objection.
	3.1	Reviewed and analyzed motion to strike objection and revoke pro hac.
	3.5	Reviewed and analyzed motion and suggestions in support of final approval.
	0.9	Email exchanges with Mikell West and lc re motion to strike.
1/11/2023	3.8	Reviewed all other objections and prepared a chart demonstrating client's objection provided only meaningful opposition to fees.
1/13/2023	0.4	Reviewed docket entry concerning proposed orders and exchanged email with lc and Mikell West re the same.
11/14/2023	0.5	Email exchange with lc and Mikell West regarding Local Rules and proposed orders.
	7.6	Outlined and drafted suggestions in opposition to motion to strike and revoke.
1/15/2023	6.9	Continued drafting suggestions in opposition to motion to strike and revoke.
1/16/2023	2.8	Drafted declaration in support of suggestions in opp to motion to strike and revoke.
	6.7	Continued drafting suggestions in opp to motion to strike and revoke.
	0.2	Emailed Mikell West and lc re suggestions in opp to motion to strike/revoke.
1/17/2023	0.8	Email exchanges with Mikell West and lc re suggestions in opp to motion to strike/revoke and declarations in support.
	3.5	Edited, finalized, and filed draft suggestions in opp to motion to strike and revoke phv.
1/18/2023	0.3	Email exchange with lc re reply in support of objection.
	6.7	Drafted suggestions in response to motion for final approval/fees.
	0.4	Reviewed and analyzed supp declaration in support of final approval.
1/19/2023	2.1	Reviewed and analyzed class counsels' reply in support of motion to strike/revoke.
	0.7	Email exchanges with Mikell West and lc re suggestions in response to motion for final approval/fees.
	3.2	Edited, finalized and filed suggestions in response to motion for final approval/fees.
1/20/2023	0.6	Call with Mikell West re fairness hearing.
1/23/2023	1.2	Drafted proposed order on attorneys' fees and proposed order denying motion to strike/revoke.
	0.3	Email exchanges with lc and Mikell West re proposed orders.
1/24/2023	0.4	Email exchanges with lc and Mikell West re proposed orders.
	0.4	Made edits to proposed orders.

	0.2	Reviewed email from lc to Chambers re proposed orders.
2/1/2023	3.2	Reviewed and analyzed Health Republic from the Federal Circuit Court of Appeals to submit as supplemental authority.
	0.4	Email exchanges with Mikell West and lc re Health Republic.
2/2/2023	0.3	Email exchange with lc and Mikell West re transcript from fairness hearing.
	2.4	Drafted and filed notice of supplemental authority discussing Health Republic.
	0.3	Email exchanges with lc and Mikell West re notice of supp authority filing.
2/3/2023	0.4	Additional email exchange with lc and Mikell West re notice of supp authority filing.
	0.8	Reviewed and analyzed class counsels' post-hearing reply in support of suggestions in support of motion for final approval and in opposition to Hampe objection.
	0.3	Reviewed and analyzed second supplement to declaration of settlement administrator.
	0.9	Reviewed and analyzed class counsels' response to notice of supplemental authority.
2/6/2023	0.3	Analyzed docket entry removing class counsels' proposed orders from the docket.
	0.4	Email exchange with lc and Mikell West re proposed orders.
	1.3	Reviewed and analyzed class counsels' proposed orders.
	0.3	Email exchange with court reporter re transcript from fairness hearing.
2/14/2023	1.4	Reviewed and analyzed transcript from fairness hearing.
3/2/2023	0.7	Reviewed class counsels' notice of supplemental authority.
	2.3	Analyzed Tenth Circuit's Syngenta opinion.
	0.2	Emailed lc and Mikell West re response to notice of supplemental authority.
3/7/2023	2.4	Outlined, drafted, edited, and filed response to class counsels' notice of supplemental authority.
	0.3	Emailed lc and Mikell West re edits to response to notice of supp authority.
6/28/2023	0.4	Analyzed order denying motion to remand.

6/29/2023	1.2	Analyzed order granting motion to strike and revoke.
	2.7	Analyzed order granting settlement approval and awarding fees.
	0.4	Analyzed order granting motion to strike Pentz objection.
	0.2	Emailed Mikell West re calendaring notice of appeal.
	0.5	Call with Mikell West re court orders.
7/12/2023	2.6	Additional review of orders.
	0.5	Call with lc re ensuring proposed orders included in record.
	0.5	Analyzed rules for supplementation of record.
7/13/2023	1.2	Legal research in connection with potential appeal.
	2.2	Reviewed and analyzed construction of settlement re effective date and distribution.
7/14/2023	2.4	Legal research in preparation for potential appeal.
7/25/2023	0.6	Drafted notice of appeal.
	0.2	Email exchange with lc re notice of appeal.
7/26/2023	0.4	Edits to notice of appeal.
	0.5	Email exchange re filing of notice of appeal.
7/30/2023	0.2	Email to lc re notice of appeal.
7/31/2023	0.4	Email exchange with lc and Mikell West regarding notice of appeal and notices in the case.
	0.3	Email exchange with Mikell West re notice of appeal.
8/1/2023	0.3	Email exchange with lc re participation in appeal.
8/2/2023	0.4	Signed up for case updates on Lexis in lieu of notices from the court.
8/3/2023	0.5	Reviewed court of appeals' docketing letter and calendared events.
	0.3	Email exchange with lc and Mikell West re docketing appeal.
8/4/2023	0.5	Filed appearance in appeal.
	0.4	Email exchange with lc and Mikell West re appeal.
8/7/2023	0.3	Emails from lc re Pentz appeal and transmission of record.
	0.4	Called case manager re including proposed orders in record.
8/8/2023	0.5	Email exchanges with lc and Mikell West re appeal.
8/9/2023	2.1	Outlined items to designate in record; drafted items to designate in record for appeal.
	0.5	Drafted method of appendix preparation.
	0.5	Drafted certification re transcript.
	0.4	Email exchange with lc and Mikell West re designation of matters in the record, method of appendix prep, and transcript.
8/10/2023	0.6	Edited items to designate in the record; e-filed items to designate in the record, method of appendix prep, and certification re transcript.
	0.4	Email exchange with lc and Mikell West re supplementing record.
8/13/2023	2.6	Drafted statement of issues for appeal.
	0.3	Emailed lc and Mikell West re draft of statement of issues.

8/14/2023	0.4	Email exchange with lc and Mikell West re draft of statement of issues.
	0.8	Edited and filed Appellant's designation and statement of issues.
8/18/2023	0.9	Reviewed docs for inclusion in appendix; emailed printer re same.
8/21/2023	0.4	Reviewed class counsels' designation of record.
9/6/2023	8.3	Legal research on attorneys' fees inside and outside the Eighth Circuit in prep for draft of Appellant's Brief.
9/7/2023	6.8	Legal research on attorneys' fees in prep for draft of Appellant's Brief.
9/8/2023	5.5	Legal research on striking objections and revoking pro hac in prep for draft of Appellant's Brief
9/9/2023	7.1	Prepared outline for argument section of Appellant's Brief; started drafting attorneys' fees section of Appellant's Brief.
9/10/2023	3.1	Additional legal research on attorneys' fees for drafting of Appellant's Brief.
	6.8	Continued drafting attorneys' fees section of Appellant's Brief.
9/13/2023	0.3	Email exchange with lc re appeal.
	4.5	Continued drafting attorneys' fees section of Appellant's Brief.
	1.6	Additional legal research for attorneys' fees section of Appellant's Brief.
9/14/2023	0.3	Email exchange with lc re appeal.
	7.5	Continued drafting attorneys' fees section of Appellant's Brief.
9/15/2023	5.1	Continued drafting attorneys' fees section of Appellant's Brief.
	4.2	Drafted section of Appellant's Brief on striking of objection.
9/16/2023	1.8	Continued drafting section of Appellant's Brief on striking of objection.
	2.6	Additional legal research on revoking and disqualification.
	4.5	Drafted section of Appellant's Brief re revocation.
9/17/2023	4.5	Made thorough edits to argument section of Appellant's Brief.
9/19/2023	2.6	Drafted motion to supp the record.
	0.7	Email exchange with lc and Mikell West re appeal.
	0.2	Email exchange with printer re m/supplement.
	0.5	Edited motion to supp the record and e-filed.
	0.4	Email exchange with printer re appendix.
9/20/2023	0.5	Email exchanges with printer re appendix and covers.
	0.6	Reviewed revised draft of Appendix.
	0.3	Email exchange with lc and Mikell West re edits to fee argument in Appellant's Brief.
9/21/2023	0.2	Email exchange with lc and Mikell West re edits to statement of the case in Appellant's Brief.
	7.3	Drafted statement of the case for Appellant's Brief.

9/22/2023	0.4	Email exchange with printer re addendum.
	0.9	Email exchanges with lc and Mikell West re Appellant's Brief.
	1.4	Continued drafting statement of the case for Appellant's Brief.
	1.5	Drafted summary of the case for Appellant's Brief.
	2.7	Added record cites to Appellant's Brief.
	2.5	Incorporated edits of brief from Mikell West and lc into Appellant's Brief.
	1.7	Finalized Appellant's Brief and Addendum for filing; filed the same.
9/26/2023	0.3	Email exchange with printer re paper copies to counsel.
	0.5	Additional email exchange with printer re paper copies to counsel.
10/2/2023	0.3	Reviewed class counsels' motion to supplement the record.
	0.2	Reviewed court of appeals' notice of receipt of paper copies of Appellant's Brief.
10/10/2023	0.4	Reviewed class counsels' motion to consolidate appeals.
10/11/2023	0.3	Email exchanges with lc and Mikell West re consolidation and supplementing record.
10/12/2023	0.2	Reviewed order regarding consolidation.
10/13/2023	0.2	Reviewed order re supplementing record.
12/5/2023	0.8	Analyzed Pentz Appellant's Brief.
12/11/2023	0.2	Reviewed class counsels' withdrawal of counsel.
12/18/2023	0.2	Reviewed class counsels' notice of appearance in appeal.
12/20/2023	0.5	Reviewed class counsels' motion to file overlength brief.
		Reviewed class counsels' motion for extension to file Appellees' Brief.
12/29/2023	0.3	
1/3/2024	0.2	Reviewed order re overlength brief and extension for class counsel.
1/11/2024	4.5	Analyzed class counsels' Appellees' Brief.
1/12/2024	1.3	Started outlining arguments for Appellant's Reply Brief.
1/24/2024	1.6	Drafted and filed motion for extension to file Appellant's Reply Brief.
1/25/2024	0.2	Reviewed court of appeals' order granting extension.
2/1/2024	1.1	Continued drafting outline for Appellees' Brief.
	2.5	Conducted legal research in support of fee argument for Reply Brief.
	4.2	Started drafting fee argument in Reply Brief.
2/2/2024	8.4	Continued legal research and drafting fee argument in Reply Brief.
2/4/2024	7.6	Continued drafting fee argument in Reply Brief.
2/5/2024	0.4	Email exchange with Mikell West re fee section of Reply Brief.
	6.8	Completed drafting fee argument in Reply Brief.
	2.1	Legal research on striking objection for Reply Brief.
	1.3	Started drafting section of Reply Brief on stricken objection.
2/6/2024	0.7	Email exchanges with Mikell West re edits to Reply Brief.
	4.3	Continued drafting section of Reply Brief re stricken objection.

	1.5	Legal research re revocation of admission.
	1.6	Started drafting section of Reply Brief addressing revocation.
2/7/2024	0.5	Email exchanges with Mikell West re edits to Reply Brief.
	3.2	Drafted introduction for Reply Brief.
2/8/2024	3.1	Edited sections of Reply Brief addressing striking the objection and revoking.
	0.6	Email exchanges with Mikell West re edits to Reply Brief.
2/9/2024	4.5	Edited, finalized, and filed reply brief.
	0.2	Emailed printer final version of reply brief.
2/13/2024	4.1	Drafted second motion to supplement the record, gathered documents to supplement the record for second motion to supplement.
	0.3	Emailed Mikell West re edits to second motion to supplement.
2/21/2024	1.2	Edited, finalized, and e-filed second motion to supplement the record.
	0.4	Reviewed notice from court of appeals re potential dates for argument and reviewed calendar for conflicts.
2/22/2024	0.5	Email exchange with Mikell West re potential conflicts for argument dates.
	0.3	Email exchange with Tony LaCroix re potential conflicts for argument dates.
2/23/2024	0.2	Reviewed Pentz letter re argument dates.
	1.3	Drafted letter to court of appeals re potential conflicts for possible argument dates.
2/27/2024	0.2	Email exchange with lc re edits to letter to court of appeals on potential conflicts for argument dates.
	0.3	Edited letter to court of appeals on potential conflicts for possible argument dates and e-filed.
2/29/2024	0.4	Reviewed class counsels' letter re oral argument.
	0.1	Emailed lc re oral argument.
5/13/2024	2.8	Drafted reply letter to class counsels' letter re argument.
5/15/2024	0.3	Reviewed court's order discussing argument.
5/21/2024	0.4	Reviewed order setting argument.
5/21/2024	0.3	Reviewed Pent argument response form.
	3.7	Analyzed Drazen v. Pinto opinion from 11 <sup>th</sup> Circuit and drafted Rule 28j supplemental authority letter.
5/22/2024	0.2	Email exchange with Mikell West re Rule 28j letter.
	0.5	Incorporated edits to Rule 28j letter and e-filed.
6/9/2024	0.3	Analyzed argument response form from class counsel.
	0.7	Analyzed class counsels' response to Appellant's Rule 28j letter.
6/9/2024	6.5	Travel from Corpus Christi, Texas to St. Louis for argument.

	3.1	Preparation for oral argument.
	0.3	Email exchange with John Pentz re division of argument.
6/10/2024	7.8	Continued preparation for oral argument.
	1.4	Moot court with lc.
	0.3	Email exchange with Pentz re argument.
6/11/2024	2.2	Final prep for oral argument.
	0.4	Travel to and from courthouse.
	7.5	Appeared at courthouse for argument; argued case; travel back to Corpus Christi.
6/13/2024	7.8	Legal research and drafted proposed sur-reply on the issue of whether clear and convincing evidence is required to support a finding of bad faith for inherent authority sanctions.
6/14/2024	2.1	Edited proposed sur-reply on the issue of whether clear and convincing evidence is required to support a finding of bad faith for inherent authority sanctions.
	3.4	Drafted motion for leave to file sur-reply.
6/17/2024	0.4	Email exchange with lc and Mikell West re edits to motion for leave and proposed sur reply.
	2.7	Incorporated edits to motion for leave and proposed sur reply; finalized and filed.
6/25/2024	0.1	Emails with lc re class counsels' response to m/supplement.
6/26/2024	3.6	Reviewed lc's draft of reply in support of motion for leave to file sur-reply, conducted additional legal research in support, edited reply, and filed.
6/27/2024	0.3	Reviewed order granting motion for leave to file supp brief.
	0.2	Emailed printer re paper copies of supplemental brief.
7/12/2024	1.1	Reviewed class counsels' supp brief on whether inherent authority sanctions require proof by clear and convincing evidence.
7/29/2024	2.1	Reviewed court of appeals' judgment and opinion.
	0.4	Call with Mikell West re court of appeals' opinion.
	0.3	Call with lc re court of appeals' opinion.
7/31/2024	0.3	Emailed client re 11 <sup>th</sup> Circuit opinion.
	0.4	Email exchange with lc re court of appeals' opinion.
8/23/2024	0.2	Reviewed mandate of court of appeals.
Total	430.6	

### **Hourly Billing of Mikell West, Attorney, Bandas Law Firm**

*In re: T-Mobile Customer Data Security Breach Litigation*, Case No. 421-md-03019 (W.D. Mo.) and Appeal No. 23-2744 (8th Cir.)

Date	Hours	Description
12/6/2022	0.4	Email exchange with Robert Clore re objection
	0.5	Review and analyze class notice.
	3.5	Review Settlement, motion for approval, motion for fees, and exhibits.
	0.3	Draft edits to Hampe declaration.
12/7/2022	0.6	Email exchange with Robert Clore re pro hac vice applications and attachments
	0.5	Draft edits to phv application.
12/8/2022	2.5	Draft edits to objection.
12/19/2022	0.3	Review and analyze subpoena.
12/21/2022	0.4	Email exchange with Robert Clore regarding position paper on subpoena.
	0.5	Phone conference with Court and counsel.
	2.1	Draft edits to position paper on subpoena.
12/22/2022	0.2	Review order on discovery for Hampe.
12/29/2022	0.3	Text exchange with Robert Clore re privilege log
	0.5	Draft and prepare edits to privilege log and objection.
12/30/2022	0.8	Email exchanges with Tony LaCroix and Robert Clore re discovery responses.
	0.2	Text exchange with Robert Clore re discovery.
1/1/2023	0.4	Texted Robert Clore regarding client deposition.
1/2/2023	1.1	Teleconference with Robert Clore and Cassie Hampe re deposition.
	0.3	Text exchanges with Robert Clore re deposition.
	0.5	Email exchanges with Robert Clore re deposition.
1/3/2023	6.1	Travel to Tyler, Texas, for deposition of Cassie Hampe
	6.2	Travel from Tyler to Corpus Christi following deposition of Cassie Hampe.
	3.5	Prepare for and attend deposition of Cassie Hampe.
1/10/2023	1.5	Reviewed deposition transcript of Cassie Hampe.
	2.5	Reviewed motion to strike objection and motion to strike PHV.
	0.9	Email exchanges re motions to strike.
1/11/2023	1.0	Reviewed objection and prepared for fairness hearing.
1/13/2023	0.6	Email exchange with Robert Clore and Tony LaCroix re proposed orders; review of orders.

1/14/2023	0.5	Email exchanges with Robert Clore and Tony LaCroix re local rules and proposed orders.
1/16/2023	0.2	Email exchange with Robert Clore and Tony LaCroix re opposition to motions.
1/17/2023	0.8	Email exchanges with Tony LaCroix and Robert Clore re opposition to motions.
	3.9	Prepare and outlined arguments for fairness hearing.
1/18/2023	4.1	Prepare and outlined arguments for fairness hearing.
1/19/2023	6.0	Travel from Corpus Christi to Kansas City for fairness hearing.
	0.7	Email exchange with Tony LaCroix and Robert Clore re responses to motion for approval/fees.
	6.5	Review motions/responses/replies in preparation for fairness hearing.
1/20/2023	6.5	Travel from Kansas City to Corpus Christi following fairness hearing.
	0.6	Call with Robert Clore re fairness hearing.
	6.0	Prepare for and attend fairness hearing.
1/23/2023	0.3	Email exchanges with Robert Clore and Tony LaCroix re proposed orders.
	0.5	Draft edits to proposed orders denying motion to strike and revoke.
1/24/2023	0.4	Email exchanges with Tony LaCroix and Robert Clore re proposed orders.
2/1/2023	0.4	Email exchanges with Tony LaCroix and Robert Clore re case law
2/2/2023	0.3	Email exchanges with Tony LaCroix and Robert Clore re hearing transcript.
	0.3	Email exchanges with Tony LaCroix and Robert Clore re supplemental authority.
2/3/2023	0.4	Email exchanges with Tony LaCroix and Robert Clore re filing re supplemental authority.
2/6/2023	0.4	Email exchange with Tony LaCroix and Robert Clore re proposed orders.
	1.0	Review and analyze proposed orders.
2/14/2023	1.0	Review and analyze transcript from fairness hearing.
3/2/2023	0.2	Email exchange re notice of supplemental authority.
3/7/2023	0.3	Email exchange re edits to response to notice of supp authority.
6/29/2023	2.0	Review and analyze order on Motion to Strike objection and revoke phv.
	1.9	Review and analyze order approving settlement and class counsel fee.
	0.2	Email exchange with Robert Clore re order and post-judgment deadlines.

	0.5	Phone call with Robert Clore regarding orders.
7/25/2023	0.5	Edits to notice of appeal.
7/31/2023	0.4	Email exchange regarding notice of appeal and electronic filing/notice revocation.
	0.3	Email exchange re notice of appeal edits and filing.
8/3/2023	0.3	Email exchange re docketing appeal.
8/4/2023	0.4	Email with Tony LaCroix and Robert Clore re appeal.
8/8/2023	0.5	Email exchange with Robert Clore and Tony LaCroix re appeal.
8/9/2023	0.4	Email exchange with Tony LaCroix and Robert Clore regarding designation of matters in the record, method of appendix prep, and transcript.
8/10/2023	0.4	Email exchange with Tony LaCroix and Robert Clore re supplementing the record.
8/13/2023	0.3	Emailed Tony LaCroix and Robert Clore re draft of statement of issues.
	0.5	Draft edits to statement of issues.
8/14/2023	0.4	Email exchange with Tony LaCroix and Robert Clore re draft of statement of issues.
	0.4	Draft edits to statement of issues.
9/14/2023	3.2	Draft edits to appellant's brief.
9/19/2023	0.7	Email exchange with Tony LaCroix and Robert Clore re appeal.
9/20/2023	0.3	Email exchange with Tony LaCroix and Robert Clore regarding edits to fee argument in Appellant's Brief.
9/21/2023	0.2	Email exchange with Tony LaCroix and Robert Clore regarding edits to statement of the case in Appellant's Brief.
	3	Draft edits to appellant's brief.
9/22/2023	0.9	Email exchanges with Tony LaCroix and Mikel West re Appellant's Brief.
	4.5	Draft and prepare edits to Appellant's brief.
10/11/2023	0.3	Email exchanges with Tony LaCroix and Robert Clore regarding consolidation and supplementing the record.
2/5/2024	0.4	Email exchange with Robert Clore re fee section Reply Brief.
	3.5	Draft and prepare edits to Appellant's reply brief.
2/6/2024	3	Draft and prepare edits to Appellant's reply brief.
	0.7	Email exchanges with Robert Clore regarding edits to Reply Brief.
2/7/2024	0.5	Email exchanges with Robert Clore regarding edits to Reply Brief.
	2.0	Draft and prepare edits to Appellant's reply brief.

2/8/2024	0.6	Email exchanges with Robert Clore regarding edits to Reply Brief.
	1.8	Final edits to reply brief
2/9/2024	0.3	Emailed Robert Clore re edits to second motion to supplement the record.
2/12/2024	0.5	Edits to motion to supplement record.
2/21/2024	0.5	Email exchange with Robert Clore regarding potential conflicts for argument dates.
5/21/2024	0.2	Email exchange with Robert Clore re Rule 28j letter.
	0.5	Edits to Rule 28j letter
6/10/2024	1.5	Assist with preparation for oral argument
6/17/2024	0.4	Email exchange with Tony LaCroix and Robert Clore re edits to motion for leave and proposed sur reply.
7/29/2024	0.4	Call with Robert Clore re Court of Appeals' opinion.
	2.0	Review and analyze Court of Appeals' opinion
Total	120.8	

## **Hourly Billing of Norman Taylor, Paralegal, Bandas Law Firm**

*In re: T-Mobile Customer Data Security Breach Litigation, Case No. 421-md-03019 (W.D. Mo.) and Appeal No. 23-2744 (8th Cir.)*

Date	Hours	Description
12/8/2022	1.9	Finalized edits, review and File Objection (Doc 189)
12/8/2022	0.5	Review, File PHV Clore & West (Doc 190&191)
12/9/2022	0.2	Received, review and saved Order on PHV (Doc 193)
6/30/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
7/3/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
7/5/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
7/6/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
7/7/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
7/10/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
7/11/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
7/12/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
7/13/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
7/14/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
7/17/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
7/18/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
7/19/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
7/20/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
7/21/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.

7/24/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
7/25/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
7/26/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
7/27/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
7/28/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
7/31/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
8/1/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
8/2/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
8/3/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
8/4/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
8/4/2023	0.3	Finalized edits and filed Notice of Appearance-Clore
8/7/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
8/8/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
8/9/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
8/10/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
8/10/2023	0.4	Finalized edits and filed Method of Appendix Preparation.
8/10/2023	0.4	Request/secure certified copy of transcript.
8/10/2023	0.5	Finalized edits and filed Designation of Record Filed.
8/11/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
8/14/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
8/14/2023	0.7	Finalized edits and filed Statement of issues
8/15/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.

8/16/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
8/17/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
8/18/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
8/21/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
8/22/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
8/23/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
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8/30/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
8/31/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
9/1/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
9/5/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
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9/19/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
9/19/2023	0.4	Finalized edits and filed Motion to Supplement Record
9/20/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
9/21/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
9/22/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
9/22/2023	3.6	Finalized edits and filed Appellant's Brief
9/25/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
9/26/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
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10/2/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
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11/8/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
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12/1/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
12/4/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
12/5/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
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12/28/2023	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
1/3/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
1/4/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
1/4/2024	0.5	Reviewed and saved filed copy of Appellee's Brief
1/5/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
1/8/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
1/9/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
1/10/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
1/11/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
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1/16/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
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1/22/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
1/23/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
1/24/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
1/24/2024	0.6	Finalized edits and filed Motion for Extension of Time drafted
1/25/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
1/26/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
1/29/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
1/30/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
1/31/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
2/1/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
2/2/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
2/5/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
2/6/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
2/7/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
2/8/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
2/8/2024	2.8	Finalized edits and filed Reply to Appellee's Brief

2/9/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
2/12/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
2/13/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
2/13/2024	0.3	Finalized edits and filed Second Motion to Supplement Record
2/14/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
2/15/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
2/16/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
2/19/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
2/20/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
2/21/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
2/22/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
2/23/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
2/26/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
2/27/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
	0.3	Finalized edits and filed Letter to Court re: oral Argument Availability
2/28/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
2/29/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
3/1/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
3/4/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
3/5/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
3/6/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.

3/7/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
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4/2/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
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4/4/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
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4/8/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
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4/30/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
5/1/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
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5/6/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
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5/10/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
5/13/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
5/13/2024	0.3	Received, saved, and calendared Notice of Scheduled Oral Argument
5/14/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
5/15/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
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5/20/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
5/21/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
5/21/2024	0.2	Oral argument appearance form filed.
5/22/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
5/23/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
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5/31/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
6/3/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
6/4/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
6/5/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
6/6/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
6/7/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
6/10/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
6/11/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
6/12/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
6/13/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
6/14/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
6/17/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
6/17/2024	0.5	Finalized edits and filed motion to file supplemental brief.
6/18/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
6/19/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
6/20/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
6/21/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
6/24/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
6/25/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
6/26/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.

6/26/2024	0.3	Finalized edits and filed reply in support of motion to file supplemental brief.
6/27/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
6/28/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
7/1/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
7/2/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
7/3/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
7/5/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
7/8/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
7/9/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
7/10/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
7/11/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
7/12/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
7/15/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
7/16/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
7/17/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
7/18/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
7/19/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
7/22/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
7/23/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
7/24/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.

7/25/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
7/26/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
7/29/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
7/30/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
7/31/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
	2.1	Receive, review, upload USCA Judgment/Opinion (Doc 248)
8/1/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
8/2/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
8/5/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
8/6/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
8/7/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
8/8/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
8/9/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
8/12/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
8/13/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
8/14/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
8/15/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
8/16/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
8/19/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
	0.4	Receive, review, upload Order on PHV (Doc 250)
	0.3	Edit, file, upload Motion PHV (Doc 249)

8/20/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
8/21/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
8/22/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
8/23/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
8/23/2024	0.6	Receive, review, upload Mandate (Doc 252)
8/26/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
8/27/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
8/28/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
8/29/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
8/30/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
9/3/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
9/4/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
9/5/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
9/6/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
9/9/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
9/10/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
9/11/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
9/12/2024	0.1	Review District Court docket and Lexis CourtLink for filings, events, or developments due to lack of automated electronic notices.
9/12/2024	1.6	Review docs needed for TC w. Judge Wimes, prepare hearing folders.
9/13/2024	0.5	TC w/ Clerk re: reinstatement of PHV for Clore, West
Total	50.1	

Hourly Billing of Anthony LaCroix, Attorney, LaCroix Law Firm, LLC

*In re: T-Mobile Customer Data Security Breach Litigation*, Case No. 421-md-03019 (W.D. Mo.) and Appeal No. 23-2744 (8th Cir.)

Date	Hours	Description
12/6/2022	0.3	Emails with R Clore re phv and objection; call with R Clore re same.
12/7/2022	1.0	Reviewed and completed phv motion, reviewed local rules re phv motions; emails with R. Clore and M West re same; drafted bio and representative cases for inclusion in objection.
12/8/2022	3.0	Edits to objection of Hampe and review of same; emails with R. Clore and M. West re objection and motions for admission; call with R. Clore re filing; finalize and filed objection; motions phv and exhibits; email to R. Clore and M. West with file stamped documents.
12/16/2022	0.4	Email from class counsel re depo of client; call with R. Clore re same and other objections filed; review of standing case law.
12/19/2022	0.4	Calls with R. Clore re request for client depo and class counsel request for discovery conference; edits to proposed email to Court.
12/20/2022	4.5	Download all objections; call w/R. Clore re conference w/Court on objector deposition; review and analysis of 19 other objections; review motion for attorney fees and preliminary approval order.
12/21/2022	3.8	Prepare for conference call with Court; call with R. Clore and M. West re strategy and position; attend conference; call with R. Clore and M West re position letter; emails with Court deputy re position letter; review and exchange drafts of position letter; call w/R. Clore re same; finalize and submit position letter to court; review filed exclusions.
12/22/2022	0.3	Call w/R. Clore and M. West re court order allowing objector discovery; emails w/class counsel and R. Clore re objector subpoenas; call w/R. Clore re attendance at depo.
12/29/2022	0.3	Call w/R. Clore and M. West response to subpoenas.
12/30/2022	0.5	Review documents for production; draft objection to document subpoena and privilege log; review local rules for compliance; emails w/R. Clore and M. West re same; final review of objection, log and documents.
1/2/2023	1.1	Depo prep zoom meeting with C. Hampe, R. Clore and M. West.
1/3/2023	2.5	Standing by for call-in to C. Hampe deposition; attend same.
1/10/2023	1.8	Emails w/ R. Clore re leave to file reply in support of objection; analysis of local rules re same; review of C. Hampe depo transcript; review of motion to strike Hampe objection and PHV admissions; emails w/ R. Clore re motion.

1/11/2023	1.9	Emails w/R. Clore re timing of response to motion to strike; review and analysis of motion for final approval, review chart of objections prepared by R. Clore
1/13/2023	0.2	Emails w/ R. Clore re proposed orders.
1/15/2023	0.2	Emails w/R. Clore re proposed orders and final fairness hearing; review of local rules re proposed orders requiring settlement.
1/16/2023	0.3	Emails w/ R Clore re admission procedures and response to motion to strike; review admin procedures.
1/17/2023	2.0	Emails w/ R. Clore re response to mtn to strike; review and edits and additions to response to motion to strike; draft declaration in support of response; legal research re compliance with Missouri Rules of Professional Conduct; call w/R. Clore in response to motion to strike.
1/19/2023	1.5	Review supplement declaration of Kroll regarding exclusions from class; review Dougherty objection; review reply in support of motion to strike Hampe objection and PHV admissions; review and edits to response to motion for final approval; emails w/R. Clore re same; review preliminary approval order and related documents.
1/20/2023	4.0	Prepare for final fairness hearing; attend hearing/ conf w/M. West re same.
1/23/2023	0.3	Call w/R. Clore re final fairness hearing and proposed orders.
1/24/2023	1.1	Review and edit proposed orders on motion to strike objection and PHV admissions and motion for attorney fees; emails w/ R. Clore re same; final review of proposed orders; review administrative procedures for same; email proposed order to chambers and opposing counsel.
2/1/2023	0.3	Review and analysis of Health Republic case.
2/2/2023	0.2	Review notice of supplemental authority; emails w/ R. Clore re same.
2/3/2023	0.2	Review reply in support of motion for final approval; emails w. R. Clore re same.
2/6/2023	0.3	Review class counsel response to notice of supplemental authority; review class counsel's proposed orders striking objections and PHV admissions and approving class settlement.
3/2/2023	0.1	Review notice of supplemental authority re Syngenta case.
3/7/2023	0.3	Review and edits to response to notice of supplemental authority; review local rules on page limits.
7/12/2023	0.5	Call w/ R Clore re orders from WDMO and next steps.
7/25/2023	0.1	Emails w/R Clore re notice of appeal.

7/26/2023	0.5	Emails w/R. Clore re notice of appeal and emergency motion to stay bond; analysis of FRAP 8 and relevant case law.
7/31/2023	0.2	Review and edit notice of appeal; file notice of appeal.
8/9/2023	0.1	Draft and file entry of appearance in 8 <sup>th</sup> Circuit.
8/11/2023	0.1	Download and review appeal initiation documents.
8/14/2023	0.6	Review email from R. Clore re statement of issues; legal research re statement of issues under FRAP and 8 <sup>th</sup> Cir. Rule; edits to statement of issues; email to R. Clore re same.
9/20/2023	1.8	Review and edit attorney fees section of brief; email to R. Clore re same.
9/22/2023	8.5	Emails re cover sheets; call w. R. Clore re remaining sections of brief and edits to brief; review FRAP and 8 <sup>th</sup> Cir. Rules re sections of brief; draft jurisdictional statement and summary of arguments; edits to entire brief; emails with R. Clore with thought on edits; draft summary of the case; additional edits to meet word limits; final edits.
9/25/2023	0.1	Received and review brief deficiency notice.
10/3/2023	0.2	Download and review plaintiffs' motion to supplement the record.
10/25/2023	0.1	Review order consolidating appeals; docket deadlines.
2/22/2024	0.2	Emails w/R. Clore re oral argument conflicts; additions to conflict letter.
2/23/2024	0.2	Review of correspondence re oral argument; emails w/ R. Clore re same.
5/22/2024	0.2	Review notice of updated authority from 11 <sup>th</sup> Circuit and counsel oral argument forms.
6/8/2024	3.0	Review all briefs and draft sample questions for preparation for oral argument.
6/10/2024	4.0	Travel to St. Louis
6/11/2024	3.0	Meet R. Clore for oral argument; attend oral argument.
6/11/2024	4.0	Return travel to Kansas City.
6/17/2024	1.0	Review motion to respond to cases cited by OC in oral argument and proposed brief; edits and suggestions for brief; emailed R Clore re same.
6/17/2024	0.2	Review of response in opposition to motion to file supplemental brief.
6/25/2024	0.1	Emails w/R. Clore re response to motion to file supplemental brief.
6/26/2024	3.0	Emails w. R. Clore re reply in support of motion for leave to file supplemental brief; review motion and response; review and analysis of cases cited by both sides; draft reply.
7/12/2024	0.4	Review and analysis of class counsel's response to Hampe's post-argument brief.
7/29/2024	0.7	Review court of appeals opinion; email w. R. Clore re same.
8/13/2024	0.3	Call w/ R. Clore re mediation and next steps.

8/14/2024	0.5	Review correspondence re mediation and confidentiality and MOS statute and case law re same.
8/19/2024	0.4	Complete petition for C. Bandas phv; correspondence w/ R. Clore re same; file same.
Total	66.7	